

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ERIC LANGE, et al.)
)
)
Plaintiffs,) Case No. 5:15-cv-00859-JRA
)
vs.) JUDGE ADAMS
) MAG. JUDGE LIMBERT
CORNWELL QUALITY TOOLS CO.)
)
)
Defendant.)

**AFFIDAVIT OF ROBERT M. GIPPIN
IN SUPPORT OF
MOTION FOR SANCTIONS**

STATE OF OHIO)
)
COUNTY OF SUMMIT)

ROBERT M. GIPPIN, being of lawful age and sworn according to law, states as follows:

1. I am counsel for the Cornwell Quality Tools Company in the present matter. I have been admitted to the practice of law since 1973, with substantial experience in commercial litigation.
2. On May 4, 2015, I sent the letter attached as Exhibit A to Plaintiffs' counsel, noting the violation of Fed. R. Civ. Proc. 11 by the filing of the Complaint and asking that it be withdrawn by voluntary dismissal. I received no response to the letter.
3. On June 23, 2015, I sent the Motion for Sanctions attached as Exhibit B to Plaintiffs' counsel by email and regular mail.
4. I have not received notice that the Complaint has been or will be dismissed by Plaintiffs' counsel.
5. I have done all of the work on the Motion to Dismiss and the Motion for Sanctions. I

spent in excess of 30 hours to do so, which I consider to have been efficient. At the rate of \$250.00 per hour, which in my experience is reasonable in Northeast Ohio, the attorney fees for the work would have the value of \$7,500.00.

AFFIANT STATES NOTHING FURTHER.



Robert M. Gippin

Sworn to and subscribed before me this 16th day of July, 2015



Notary Public



Heather J. Koerner
Resident Summit County
Notary Public, State of Ohio
My Commission Expires: 12/10/2018